

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION

BORRAH E. CAMPBELL II,	)	
	)	
Plaintiff	)	
	)	CIVIL ACTION NO.
v.	)	2:06-CV-205-WHA-CSC
	)	
UNITED PARCEL SERVICE, INC.,	)	
	)	
Defendant.	)	
_____	)	

**DEFENDANT UNITED PARCEL SERVICE, INC.'S INITIAL DISCLOSURES**

Comes now Defendant United Parcel Service, Inc. ("UPS") and provides initial disclosures pursuant to Federal Rule of Civil Procedure 26(a)(1).

**A. Potential Witnesses.** Pursuant to Federal Rule of Civil Procedure 26(a)(1)(A), UPS provides the following list of individuals believed to have discoverable non-privileged personal knowledge concerning significant factual issues specifically raised in the pleadings.

1. Stan Woodley, UPS Supervisor. Address: c/o United Parcel Service, Inc., through its attorneys at Alston & Bird, LLP (ATTN: Lisa Cassilly and Jeremy Tucker), One Atlantic Center, 1201 West Peachtree Street, Atlanta, Georgia 30309-3424, (404) 881-7000. Mr. Woodley may have knowledge relating to Plaintiff's employment with UPS and Plaintiff's allegations in this suit.
2. Redd Cunningham, UPS Manager, Montgomery Center. Address: c/o United Parcel Service, Inc., through its attorneys at Alston & Bird, LLP (ATTN: Lisa Cassilly and Jeremy Tucker), One Atlantic Center, 1201 West Peachtree Street, Atlanta, Georgia 30309-3424, (404) 881-7000. Mr. Cunningham may have

knowledge relating to Plaintiff's employment with UPS and Plaintiff's allegations in this suit.

3. Bob Bianchi, UPS Manager, Evergreen Center. Address: c/o United Parcel Service, Inc., through its attorneys at Alston & Bird, LLP (ATTN: Lisa Cassilly and Jeremy Tucker), One Atlantic Center, 1201 West Peachtree Street, Atlanta, Georgia 30309-3424, (404) 881-7000. Mr. Bianchi may have knowledge relating to Plaintiff's employment with UPS and Plaintiff's allegations in this suit.
4. Terrance Thomas, UPS Hub & Feeder Division Manager, Georgia District. Address: c/o United Parcel Service, Inc., through its attorneys at Alston & Bird, LLP (ATTN: Lisa Cassilly and Jeremy Tucker), One Atlantic Center, 1201 West Peachtree Street, Atlanta, Georgia 30309-3424, (404) 881-7000. Mr. Thomas may have knowledge relating to Plaintiff's employment with UPS and Plaintiff's allegations in this suit.
5. Burt Flood, UPS Manager, Mobile West Center. Address: c/o United Parcel Service, Inc., through its attorneys at Alston & Bird, LLP (ATTN: Lisa Cassilly and Jeremy Tucker), One Atlantic Center, 1201 West Peachtree Street, Atlanta, Georgia 30309-3424, (404) 881-7000. Mr. Flood may have knowledge relating to Plaintiff's employment with UPS and Plaintiff's allegations in this suit.
6. Plaintiff Borrah E. Campbell II. Mr. Campbell's last known address is 38 Fairlane Drive, Montgomery, Alabama 36106.

As discovery has only just commenced, UPS will timely supplement this list of potential witnesses in accordance with the Federal Rules of Civil Procedure.

**B. List of Documents.** Pursuant to Federal Rule of Civil Procedure 26(a)(1)(B), UPS will make available for inspection and copying at a mutually convenient time all documents, data compilations, and tangible things in its possession, custody, or control that may be used by it to support its contentions with respect to any significant factual issues in this case. Specifically, Defendant has the following documents in its possession that may be used at trial.

1. Collective Bargaining Agreement between UPS and the International Brotherhood of Teamsters.
2. Plaintiff's relevant personnel records.
3. UPS's relevant personnel and operational policies.

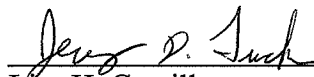
As discovery has only just commenced, UPS will timely supplement this list of documents in accordance with the Federal Rules of Civil Procedure.

**C. Damages.** Pursuant to Federal Rule of Civil Procedure 26(a)(1)(C), UPS discloses that, as the Defendant in this action, and as of this time, it has asserted no claims for damages.

**D. Insurance Agreements.** Pursuant to Federal Rule of Civil Procedure 26(a)(1)(D), UPS discloses that it has no insurance policies or agreements applicable to Plaintiff's claims in this action.

UPS expressly reserves the right to supplement the above disclosures in accordance with Federal Rule of Civil Procedure 26(e).

Served this 21<sup>st</sup> day of April 2006.



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**CERTIFICATE OF SERVICE**

This is to certify that I have this date served a copy of the within and foregoing

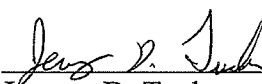
**DEFENDANT UNITED PARCEL SERVICE, INC.'S INITIAL DISCLOSURES** by United

States Mail with adequate first class postage affixed thereon, addressed as follows:

Borrah E. Campbell II  
38 Fairlane Drive  
Montgomery, AL 36106

Plaintiff *pro se*

This 21<sup>st</sup> day of April 2006.

  
\_\_\_\_\_  
Jeremy D. Tucker